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June 28, 2006

VIA ELECTRONIC FILING AND OVERNIGHT DELIVERY

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 06-36

Dear Ms. Cottrell:

Enclosed for filing, on behalf of Bay State Gas Company ("Bay State"), are Bay State's responses to the following Information Requests:

DTE 1-7

DTE 1-26

DTE 1-27

The remaining responses will be filed as soon as they are available. Please do not hesitate to contact me if you have any questions.

Very truly yours,

Patricia M. French

cc: Julie Howley Westwater, Esq., Hearing Officer
Jamie M. Tosches, Esq., Office of the Attorney General
Service List (Electronic Service per the Ground Rules)

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
FIRST SET OF INFORMATION REQUESTS FROM THE D.T.E.

D.T.E. 06-36

Date: June 28, 2006

Responsible: Joseph A. Ferro, Manager, Regulatory Policy

DTE 1-7: Refer to Exh. BSG-1, at 3 lines 1-5. Explain what the "operational risks" are to which Bay State asserts it is subject. Define what is meant by "critical day" and "potential harm" as referred to in that statement. If "critical day" is defined differently in this context than it is in Tariff M.D.T.E. No. 35, Exh. BSG-1, Att. JAF-4 at 3-4, please explain the discrepancy.

Response: Please see Bay State's response to AG-1-1, appended here for the Department's convenience. There is no difference in the use of "critical day" in this context than that in Bay State's tariff M.D.T.E. No. 35.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
FIRST SET OF INFORMATION REQUESTS FROM THE ATTORNEY GENERAL
D.T.E. 06-36

Date: June 28, 2006

Responsible: Joseph A. Ferro, Manager Regulatory Policy

AG 1-1: Please refer to Exhibit ("Exh.") BSG-1 at 3, lines 1-5. Please define
"operational risks."

RESPONSE: Operational risks as referenced in Exhibit BSG-1 at 3 are risks associated
with inadequate distribution capacity to maintain service to all of the
Company's firm customers. System reliability would be jeopardized due
to the under-delivery of gas supply into Bay State's distribution system.

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D.T.E. 06-36

Date: June 28, 2006

Responsible: Joseph A. Ferro, Manager, Regulatory Policy

DTE 1-26: Please update Exh. BSG-1, Att. JAF-2, to include data for 2005.

Response: As indicated on page 11 of Mr. Ferro's Direct Testimony, Exhibit BSG-1, Attachment JAF-2, reflects the review of data through December 2005. The "Combined Overtake" volumes (net of pool over-deliveries) that occurred in 2005 were not as high as the highest twenty daily overtake volumes for the period November 2001 through December 2005.

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RESPONSE OF BAY STATE GAS COMPANY TO THE
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D.T.E. 06-36

Date: June 28, 2006

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DTE 1-27: Discuss the significance, if any, of the fact that the overtakes shown on Exh. BSG-1, Att. JAF-2, occurred more often in 2001 and 2002, with only one instance each in 2003 and 2004.

Response: Please note that Attachment JAF-2 presents the top twenty largest "Combined Overtake" volumes in the years analyzed of 2001 through 2005. Daily overtakes occurred on many days throughout all these years, including during 2003 and 2004. However, only one instance in each of the years of 2003 and 2004 made the list of top twenty daily "Combined Overtakes," which reflects the netting of any daily pool over-deliveries. Bay State is not aware of any specific factors that would influence that only one combined overtake volume in 2003 and in 2004 made the list of the top twenty overtake volumes.